

Drawings

Applicant appreciates the Examiner's indication that the drawings filed on December 17, 2000 have been accepted.

Rejection Under 35 U.S.C. § 102

Claims 17, 19 and 20 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 5,904,779 to Dhindsa et al. (Dhindsa). This rejection is respectfully traversed.

A complete discussion of the Examiner's rejection is set forth in the Office Action, and is not being repeated here.

The Examiner asserts that Dhindsa teaches that the electrostatic attraction between wafer 208 and chuck 206 is reduced by the positioning of wafer 208 at a certain distance from chuck 206 (a predetermined distance). This assertion can be subdivided into several parts. A first part of the Examiner's assertion is that Dhindsa actually provides a teaching wherein the distance between the wafer and the chuck is an important key feature of the Dhindsa patent. A second part of the Examiner's assertion is that this distance is pre-selectable (predetermined), and a third part of the Examiner's assertion is that the pre-selected distance reduces an electrostatic attraction.

Applicants submit that with regard to “predetermined”, Dhindsa does not rely on a predetermined distance to effect electrostatic attraction, but rather, Dhindsa relies heavily on the values of resistance in a resistive arrangement (for example resistive arrangement 226 in Fig.2A). The value of resistance chosen for this arrangement is the only “predetermined” factor related to reduction of electrostatic attraction in the portion of the Dhindsa patent relied on by the Examiner.

Similarly, the “distance” described in Dhindsa only becomes a factor *after the lifting of the substrate* has commenced. The distance referred to in Dhindsa is not a “predetermined” distance. In fact, this non-predetermined distance (once it comes into play) actually serves to *increase a sticking force* between the substrate and the chuck, rather than reduce a sticking force as asserted by the Examiner (Dhindsa, Col.5, lines 22-26 and Fig.2D). In summary, the “positioning” of wafer 208 with respect to chuck 206 (especially at a predetermined distance) is of no consequence as taught by Dhindsa. Neither is the intermediate material (dielectric 210), either by thickness or other properties thereof described by Dhindsa as being a factor in the reduction of electrostatic attraction.

Therefore, Dhindsa does not teach positioning a substrate at a predetermined distance from the electrode plate to obtain an intermediate structure, wherein said positioning reduces electrostatic attraction between said substrate and said electrode plate, as recited in independent claim 17, or

wherein the intermediate material reduces electrostatic attraction between the substrate and the electrode, as recited in independent claim 20.

Claim 19 depends on claim 17, and therefore is patentable for at least the reasons stated with respect to independent claim 17. Reconsideration and withdrawal of this art grounds of rejection are respectfully requested.

Rejections under 35 U.S.C. § 103

Claims 7-10, 12, 14 and 15-16 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Dhindsa in view of U.S. Patent No. 6,243,251 to Kanno, and further in view of U.S. Patent No. 6,096,572 to Nakamura. Claim 11 stands rejected over Dhindsa, Kanno and Nakamura, as applied to claim 7, and further in view of U.S. Patent No. 5,874,361 to Collins et al. (Collins). Claim 13 stands rejected over Dhindsa, Kanno and Nakamura, as applied to claim 7, and further in view of U.S. Patent No. 5,985,104 to Westwood. These rejections are respectfully traversed.

Dhindsa (argued above with respect to independent claims 17 and 20) fails to teach that dielectric 210 effects the reduction of electrostatic attraction in any way. Neither is dielectric 210 described therein as "tape". As argued above, the reduction of electrostatic attraction occurs at a point in the lifting process wherein neither the natural distance between the wafer and chuck, nor a distance (that arguably could have been created by the thickness of the

dielectric) is a factor in the reduction of sticking power. Once sticking power begins to be reduced in the device of Dhindsa, the dielectric is far removed from any possibility of being a factor in the reduction.

There Dhindsa fails to either teach or suggest wherein said insulating tape reduces an electrostatic attraction between the second electrode and the array substrate, as recited in independent claim 7, and similarly stated in independent claim 15. Neither Kanno, nor Nakamura, nor Collins, nor Westwood can fill this vacancy.

Claims 8-14 and 16 depend, either directly or indirectly on independent claims 7 and 15. Since neither Dhindsa, nor Collins, nor Nakamura, nor Westwood discloses or suggests the above-recited features of independent claims 7 and 15, none of the combinations applied by the Examiner can render claims 7-16 obvious to one of ordinary skill in the art. Reconsideration and withdrawal of these art grounds of rejection are respectfully requested.

Conclusion

All of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicants therefore respectfully request that the Examiner reconsider all presently outstanding rejections and that they be withdrawn. It is believed that a full and complete response has been made to the

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outstanding Office Action, and as such, the present application is in condition for allowance.

If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone Percy L. Square, Registration No. 51,084, at (703) 205-8034, in the Washington, D.C. area.

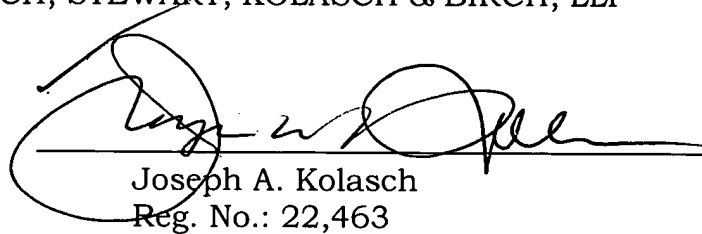
Prompt and favorable action on this Request for Reconsideration is respectfully requested.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37 C.F.R. §§ 1.16 or 1.17; particularly, extension of time fees.

Respectfully submitted,

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